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14 *Representing the United States of America*  
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16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 United States of America,

19 Plaintiff,

20 v.

21 Jeremy John Halgat,

22 Defendant.

23 2:16-cr-00265-GMN-CWH

24 **Stipulation to Continue Deadline to File  
Response to Objections (ECF Nos. 1457,  
1458)**

1 The United States and defendant Jeremy John Halgat by his undersigned counsel,  
2 stipulate to continue the date by which the Government must respond to Defendant  
3 Halgat's pending objections, filed at ECF Nos. 1457 and 1458. This stipulation is entered  
4 into based on the following.

- 5 1. On December 26, 2018, this Honorable Court issued a Report and  
6 Recommendation denying Defendant Jeremy John Halgat's Motion to Dismiss.  
7 ECF No. 1416. Defendant was ordered to file objections by January 9, 2019.
- 8 2. On January 3, 2019, the parties filed a stipulation agreeing to continue the  
9 deadline for Defendant's objections, making them due by January 23, 2019.  
10 ECF No. 1436.
- 11 3. On January 23, 2019, Defendant filed Objections and Supplemental Objections.  
12 ECF Nos. 1457, 1458. The Government was ordered to respond by February 6,  
13 2019.
- 14 4. Government counsel needs additional time to review the objections, as well as  
15 the record in this case and Defendant's prior case upon which the instant  
16 litigation primarily rests.
- 17 5. This is the first stipulation to continue the deadline for the Government's  
18 response in this matter and is requested despite the fact that the current deadline  
19 has lapsed.
- 20 6. The additional time requested herein is not sought for purposes of delay and  
21 does not require a continuance of any other dates, including the currently  
22 scheduled trial and calendar call dates.

7. Based on the foregoing, the parties ask the Court to accept this stipulation and order the Government to file its Response by February 20, 2019.

DATED this 14<sup>th</sup> day of February 2019.

Respectfully,

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Richard E. Tanasi  
RICHARD E. TANASI  
*Counsel for Jeremy John Halgat*

/s/ Christopher Burton  
CRISTINA D. SILVA  
DANIEL R. SCHIESS  
CHRISTOPHER BURTON  
Assistant United States Attorneys  
JOHN HAN  
Trial Attorney

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

United States of America,

2:16-cr-00265-GMN-CWH

Plaintiff,

**Order on Stipulation to Continue  
Deadline to File Response to Objections  
(ECF Nos. 1457, 1458)**

v.

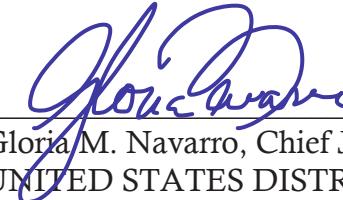
Jeremy John Halgat,

Defendant.

**ORDER**

IT IS HEREBY ORDERED that the Government's Response to Defendant's Objections (ECF Nos. 1457, 1458) is continued from February 6, 2019, to February 20, 2019.

DATED this 19 day of February, 2019.

  
Gloria M. Navarro, Chief Judge  
UNITED STATES DISTRICT COURT